

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

AROLDO RIGOBERTO CASTILLO-
SERRANO, aka BRUNO LOPEZ-ZALAS.

and

CONRADO SALGADO SOTO,

Defendants.

) INDICTMENT

) **3:15CR024**

) CASE NO. _____

) Title 8, Sections

) 1324(a)(1)(A)(ii),

) 1324(a)(1)(A)(iv),

) 1324(a)(1)(A)(v)(II), and

) 1324(a)(1)(B)(i), United States

) Code

JUDGE CARR

COUNT 1

The Grand Jury charges:

From in or around January 2013, to in or around December 2014, in the Northern District of Ohio, Western Division, and elsewhere, the defendants, AROLD RIGOBERTO CASTILLO-SERRANO, aka BRUNO LOPEZ-ZALAS, and CONRADO SALGADO SOTO, aiding and abetting each other, along with others known and unknown to the Grand Jury, encouraged and induced an alien, namely A.M. (a minor), to come to, enter, and reside in the United States, knowingly and in reckless disregard of the fact that A.M.'s coming to, entry, and residence in the United States was in violation of law and for the purpose of commercial

advantage and private financial gain, in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iv), 1324(a)(1)(A)(v)(II), and 1324(a)(1)(B)(i).

COUNT 2

The Grand Jury further charge:

In or around September 2014, in the Northern District of Ohio, Western Division, and elsewhere, the defendants, AROLDO RIGOBERTO CASTILLO-SERRANO, aka BRUNO LOPEZ-ZALAS, and CONRADO SALGADO SOTO, aiding and abetting each other, along with others known and unknown to the Grand Jury, encouraged and induced an alien, namely P.P. (a minor), to come to, enter, and reside in the United States, knowingly and in reckless disregard of the fact that P.P.'s coming to, entry, and residence in the United States was in violation of law and for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iv), 1324(a)(1)(A)(v)(II), and 1324(a)(1)(B)(i).

COUNT 3

The Grand Jury further charges:

From in or around July 2013, to in or around December 2014, in the Northern District of Ohio, Western Division, and elsewhere, the defendant, CONRADO SALGADO SOTO, along with B.D., C.S., and other persons known and unknown to the Grand Jury, knowingly and in reckless disregard of the fact that an alien had come to, entered, or remained in the United States in violation of law, transported and moved an alien within the United States by means of transportation, in furtherance of such violation of law and for the purpose of commercial advantage and private financial gain, to wit: CONRADO SALGADO SOTO drove Guatemalan aliens, including individuals whose identity is known to the Grand Jury and who are identified by

their initials as P.P. (a minor) and L.C. (a minor), in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and 1324(a)(1)(B)(i).

FORFEITURE: 8 U.S.C. § 1324(b) & 28 U.S.C. § 2461

The Grand Jury further charges:

For the purpose of alleging forfeiture pursuant to 8 U.S.C. Section 1324(b) & 28 U.S.C. Section 2461, the allegations of Counts 1 through 3, inclusive, are incorporated herein by reference. As a result of the foregoing offenses, defendants AROLDO RIGOBERTO CASTILLO-SERRANO, aka BRUNO LOPEZ-ZALAS, and CONRADO SALGADO SOTO shall forfeit to the United States all conveyances, including all vessels, vehicles, and aircraft, that has been or is being used in the commission of such offenses, the gross proceeds of such offenses, and all property traceable to such conveyances and proceeds; including, but not limited to, the following:

a.) 2010 Ford Econoline E350, Extended Club Wagon (white in color), Ohio plate: PHW2661, VIN: 1FBSS3BL6ADA03270 (approximate value: \$12,475.00).

FORFEITURE: 18 U.S.C. § 982(a)(6)

The Grand Jury further charges:

For the purpose of alleging forfeiture pursuant to 18 U.S.C. Section 982(a)(6), the allegations of Counts 1 through 3, inclusive, are incorporated herein by reference. As a result of the foregoing offenses, defendants AROLDO RIGOBERTO CASTILLO-SERRANO, aka BRUNO LOPEZ-ZALAS, and CONRADO SALGADO SOTO shall forfeit to the United States all conveyances, including all vessels, vehicles, and aircraft, used in the commission of such offenses; all real and personal property that constitutes, or is derived from or is traceable to, the proceeds obtained directly or indirectly from the commission of such offenses; and, all real and

personal property that was used to facilitate, or was intended to be used to facilitate, the commission of such offenses; including, but not limited to, the following:

- a.) 2010 Ford Econoline E350, Extended Club Wagon (white in color), Ohio plate: PHW2661, VIN: 1FBSS3BL6ADA03270 (approximate value: \$12,475.00).

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.